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I. INTRODUCTION

Mono County's Hazardous Waste Management Element (HWME) has been drafted to accomplish the following purposes:

- to establish a program for the safe and responsible management of hazardous waste in Mono County;
- to provide a program to inform Mono County generators about hazardous waste management and assist them to minimize and properly manage the waste they produce; and
- to identify potential siting areas for hazardous waste treatment, storage and disposal facilities in Mono County and to establish a set of criteria for the consideration of proposals to develop such facilities.

II. ISSUES/OPPORTUNITIES/CONSTRAINTS

The issues involved in Mono County's management of hazardous waste arise from the County's natural setting, small population, small amount of land in private ownership or under county control, lack of industry, relative isolation, limited transportation network, and scarcity of resources for implementing programs.

Hazardous waste management for Mono County essentially means working with small-quantity generators (SQGs) and households to reduce hazardous waste production and to manage in a safe and efficient manner the wastes that are produced.

Specific issues for Mono County include the following:

- 1) How shall Mono County implement programs to manage and reduce hazardous wastes generated by small businesses, public agencies and households?
- 2) How shall Mono County identify and exploit opportunities for regional cooperation in hazardous waste management?
- 3) What area(s) in Mono County might be suitable for hazardous waste treatment, storage and disposal facilities?

General Policy Approach

Mono County and the Town of Mammoth Lakes will act to provide for the safe, effective management of hazardous wastes generated within the county. New offsite hazardous waste management facilities shall be primarily limited to a scale necessary to meet the hazardous waste management needs of Mono County; larger facilities may be permitted in accordance with agreements reached between Mono County and other jurisdictions or upon determination of the local governing body that the project meets local planning criteria and serves public needs. The "fair share principle", as defined below, will guide the county's efforts to provide for the management of hazardous wastes generated within the county.

Mono County and the Town of Mammoth Lakes recognize their collective responsibility to cooperate with other governments in the region and the state in planning for the effective management of hazardous wastes generated in the region and the state in accordance with the hazardous waste management hierarchy. Sound hazardous waste management planning, waste reduction efforts, and appropriate facility siting are the mutual responsibility of all governments. To this end, the county and the Town encourage multi-county and regional efforts to plan and implement alternatives to land disposal of untreated wastes and to limit the risks posed by the transportation of hazardous wastes around the state. Agreements for new facilities to provide the offsite capacity needed for hazardous waste treatment and residuals disposal should be reached among jurisdictions according to their fair share of the hazardous waste stream, each jurisdiction's environmental suitability for different types of facilities, their economic interests, and the economic viability of different types and sizes of facilities. Any privately-owned facility located in Mono County shall be available to serve generators from inside and outside the county.

"Fair share" denotes that each county is responsible for the disposition of its own waste; that is, responsible for its fair share of waste management. A county cannot be required to accept a facility with a capacity that significantly exceeds the county's own needs, except as provided by an inter-jurisdictional agreement. It is recognized that the waste streams in each county will probably not support an economically efficient hazardous waste facility of each type needed to handle a county's waste. Therefore, counties are encouraged to enter into inter-jurisdictional agreements to balance economic efficiency in the size of facilities and to responsibly handle their fair share of the wastes generated. If the county has approved the siting of a facility or facilities that have a capacity equal to or in excess of the county's total hazardous waste management needs, the county will have achieved its fair share of hazardous waste management facility siting and cannot be forced to accept the siting of additional facilities except as provided by an inter-jurisdictional agreement.

Mono County recognizes that if it does not fulfill its obligations under implementation objectives 1-3 (see below), county policy with regard to the siting of facilities will be to permit the siting of environmentally appropriate facilities, otherwise consistent with the HWME, without regard to the fair share principle.

Siting Criteria

Any proposed specified hazardous waste management facility shall be consistent with the goals and policies of this plan. In particular, any proposed facility shall be consistent with the fair share principle, and with any inter-jurisdictional agreements on hazardous waste management. Local needs are to be the primary basis for this decision, along with regional commitments. Specifically, facilities are to be designed and sized primarily to meet the hazardous waste management needs of Mono County, or to meet the county's broader commitments under an inter-jurisdictional agreement or upon determination of the local governing body that the project meets local planning criteria and serves public needs.

Implementation Objectives

1. Siting Consistency

Mono County and the Town of Mammoth Lakes, shall require that all local land use decisions on siting specified hazardous waste management facilities are consistent with the goals and policies and the siting criteria contained in the HWME. Specifically, the county will approve the siting of an environmentally appropriate facility that is consistent with the policies of this plan and disapprove the siting of a facility that is inconsistent with plan policies or is environmentally inappropriate.

2. County Actions

The county will actively seek to provide its unmet hazardous waste management capacity needs through any combination of the following: waste reduction, facility siting and inter-jurisdictional agreements. If the county has not provided for its unmet hazardous waste management needs (either through waste reduction, facility siting, inter-jurisdictional agreements or any combination thereof) by February 1, 1992, the county, or an organization sponsored by the county, will solicit proposals for a privately-owned hazardous waste management facility or facilities needed to manage the county's fair share of the hazardous waste stream. Proposals for hazardous waste management facilities will receive the full attention of the county planning staff and governing body. The county will continue to actively seek to provide for its unmet hazardous waste

management capacity needs until such time as the county has met those needs through any combination of waste reduction, facility siting or inter-jurisdictional agreement.

3. Focus of Inter-Jurisdictional Agreement Negotiations

Mono County shall enter into negotiations with other jurisdictions for the purpose of negotiating one or more inter-jurisdictional agreements for the siting of hazardous waste management facilities adequate and necessary to meet the needs of the signatory jurisdictions. Such agreements shall follow the principle of fair share and may take into account both the volumes and degree of hazard for the wastes generated that require offsite management within each participating jurisdiction, and the degree of waste reduction effort made by each participating jurisdiction.

If the siting of a particular type of hazardous waste management facility needed in Mono County is not environmentally appropriate or economically viable, the county shall reach an agreement with one or more other jurisdictions to facilitate the siting of a larger, environmentally appropriate and economically viable facility (or facilities) to be located elsewhere. Mono County and the Town of Mammoth Lakes, in turn, agree to actively consider and, if appropriate, to commit as part of an inter-jurisdictional agreement to approve the siting of an environmentally appropriate facility (or facilities) within its own borders designed and sized to serve the hazardous waste management needs of other jurisdictions as well as of Mono County.

Directives

Hazardous Waste Management

The HWME requires a program to inform small quantity generators and households about the proper handling of hazardous materials and wastes. It further directs that technical assistance be provided to generators to reduce the amount of hazardous waste generated and to ensure the collection and safe disposal of hazardous wastes in the County.

Implementation programs for managing hazardous waste in Mono County are outlined in appropriate policy and action statements.

Regional Cooperation

The HWME encourages Mono County to investigate and implement cooperative programs to manage hazardous wastes with Inyo, Kern and Alpine Counties, as well as with the Town of Mammoth Lakes and City of Bishop.

Siting

Because of restrictive natural conditions and limited transportation opportunities, it is extremely unlikely that an area suitable for siting a residuals repository can be found. Policies specifically addressing the siting of residuals repositories are provided to satisfy the requirements of State Guidelines.

The Mono County HWME identifies:

- The need for one or more small collection stations to facilitate the collection and safe shipment of hazardous wastes from Mono County to recycling and treatment facilities; a number of potential siting areas for these facilities are identified.

- General siting areas for larger regional facilities that could be developed in Mono County; although any such facility in Mono County would require significant mitigation, sites that appear to present the fewest difficulties have been identified in the Mono Basin and the Adobe Valley area. Even these sites, however, have substantial environmental constraints that will require expensive mitigation measures.

In order to arrive at "thumbprints" -- siting areas potentially suitable for specified hazardous waste management facilities -- exclusionary criteria were applied in an orderly fashion and areas of the county known to be unsuitable were eliminated. Maps provided in the **Master Environmental Assessment (MEA)** were consulted, except in cases where mapped data were not available.

Ninety-four percent of the land in Mono County is publicly owned, most of it under the control of the federal government. Property under the jurisdiction of Mono County accounts for approximately 10% of the County's area. Most of this land is in communities and along roads, but a large area near Lake Crowley is also under the County's jurisdiction.

The first screening of county lands eliminated from consideration lands in the Toiyabe and Inyo National Forests, and the lands controlled by the federal Bureau of Land Management (BLM), since these lands are not under the county's jurisdiction. This exclusion left significant land areas in the Antelope, Bridgeport and Long Valleys, west and south of Mono Lake along US 395, and smaller parcels of non-federally controlled land in other areas of the county.

Soil permeability was considered next, though maps could not be used for this analysis, since the US Department of Agriculture's Soil Conservation Service has not completed a study of soil permeability in Mono County. Although soil permeability could not be applied as an exclusionary criterion, the geological characteristics of Mono County are described in the MEA and these indicate that it would be difficult, perhaps impossible, to find a general siting area in Mono County that meets the California Water Resources Control Board's (SWRCB) requirement that a Class-I site be underlain by a layer of naturally occurring geologic materials with a permeability no greater than 1×10^{-7} cm/sec.

Further, this review of geologic maps indicated that significant areas not under federal control, such as the Antelope Valley, parts of the Bridgeport Valley, Mono Basin, and the Long, Hammil, and Chalfant valleys, contain alluvial or other materials that would likely be very porous. In short, although not eliminated from consideration on the basis of soil permeability, those areas of the County with the largest parcels of land under Mono County's jurisdiction are of doubtful suitability for a residuals repository.

Most of the County-controlled areas mentioned above are also the areas in which significant groundwater resources and groundwater recharge areas occur. Shallow groundwater occurs under most of the lands under County jurisdiction in the Antelope Valley, Bridgeport Valley, Mono Lake, Adobe Valley, Benton, and June Lake areas. Under DHS siting criteria, specified hazardous waste management facilities are discouraged, though not strictly excluded, from such areas. Repositories would be prohibited within areas known or suspected to be supplying principal recharge to a regional aquifer.

Significant wetland areas occur south of Mono Lake and west of US 395, in the Adobe Valley and Benton Hot Springs areas, and in the Long Valley north of Lake Crowley. These areas would be unsuitable for siting facilities.

DHS siting criteria state that "no facilities should be located within critical habitat areas, as defined in adopted general, regional, or state plans. "Special-status species", special habitats, and wildlife use areas are identified and discussed in the MEA. Major areas of Mono County under County jurisdiction that include such habitat areas are around Mono Lake and in the Long Valley / Lake Crowley area.

Seismic hazards are significant in Mono County. The western side of the Antelope Valley -- roughly overlaying US 395 from the Nevada border to the south end of the valley -- is a fault rupture hazard zone. There are several such zones in the Bridgeport Valley, paralleling or overlaying US 395 in the vicinity of Mono Lake, throughout most of the Long Valley, and east and west of the Chalfant Valley. In short, seismic and faulting risks are pandemic in those areas of Mono County containing the largest parcels of land under County jurisdiction.

Rockfall and landslide hazards could affect US 395 in the Mono Lake area. Avalanche data were not available at the time of preparation of the Draft HWME, but are a significant threat to portions of US 395 south of Mammoth Lakes. While DHS' suggested siting criteria do not include avalanche hazards, conditions in Mono County require that such hazards be considered in any responsible attempt to identify potential siting areas for specified hazardous waste management facilities.

DHS' suggested siting criteria require that residuals repositories not be sited in areas subject to flood events with a 100-year (or more frequent) return period or in areas possibly subject to floods from dam failure or similar events. Other facilities might be built in such areas, but would require engineered protection from flooding.

Flood hazards affect much of the Antelope Valley at the northern tip of Mono County, as well as Pickel Meadows and SR 108 west of US 395, the East Walker River area, significant portions of the Bridgeport Valley, and parts of the Hammil and Chalfant valleys. If the level of Lake Crowley, which supplies water to the City of Los Angeles, were raised 20 feet to allow additional storage, a considerably larger part of the Long Valley would be flooded.

Another criterion not considered in DHS' Guidelines, but required in evaluating the Mono County situation, is volcanism. Volcanic eruptions have occurred at the rate of about one per century during the past 2,000 years in Mono County. Volcanic hazards have been mapped for Mono County and are illustrated in the MEA. Volcanic Hazard Zone I, Areas Subject to Blast and/or Flow Hazards, is divided into three sub-regions:

- (a) From Inyo-Mono Crater Chain and Long Valley Caldera;
- (b) From Long Valley Caldera only;
- (c) From Inyo-Mono Crater Chain only.

Because the results of volcanic activity in Zone I could be catastrophic, areas designated as belonging to Zone I were eliminated from consideration in trying to identify general siting areas for Mono County. For the most part, those areas eliminated are already fraught with multiple hazards that would exclude them from consideration for siting a specified hazardous waste management facility.

After reviewing maps of Mono County, it became abundantly clear that those areas of the County with the largest tracts of land under the County's jurisdiction generally would be restricted from availability for siting specified hazardous waste management facilities.

A consideration of additional criteria made it imperative to look for relatively isolated, though still accessible, parcels of land under the County's jurisdiction.

The most important of these criteria is transportation. SR 120 is designated for the transport of hazardous materials both east and west of US 395. SR 120 west of US 395, however, is closed for seven or eight months of the year because of snow. There are periodic closures of shorter duration for the other designated routes as well, due to snowfall, avalanche, or rock slide.

US 395 is the only major route offering year-round direct access to other parts of California (albeit only to the south) and accessibility to most of the populated areas of Mono County as well--where the County's hazardous waste generators might be found. Transportation accessibility, while not used as an exclusionary criterion, became a key factor in searching for a TSD siting area "thumbprint" in the County.

Distance from residences or immobile populations was not a factor in looking for a siting area because such an area would be isolated anyway. This will, however, be a factor to consider in the siting of any small transfer station in Mono County, since such a facility would likely be situated relatively near to hazardous waste generation centers. Since it would not be economically feasible to develop specified hazardous waste management facilities for the amount of hazardous waste produced in Mono County, there is little reason to expect that such a facility would or should be located near population areas. In short, the search narrowed to looking for an area or two that might be suitable for siting a residuals repository.

It must be stated that there appears to be no area within Mono County that could not present significant physical problems to a developer wishing to site a facility. The areas chosen represent a first and second choice of areas that appear to meet most of the criteria and within which there may be sites that might meet all of the relevant criteria. This is the best that could be done, given the physical and geographical situation of Mono County and the amount of data available to complete the analysis.

The primary general siting area is located south of the intersection of SR 167 and Dobie Meadows Road, about 15 miles east of US 395 and about four-to-five miles west of the California-Nevada border. There is non-federal land with access from either SR 167 or Dobie Meadows Road. There is a well indicated at the northwest corner of the parcel, which covers a total area of almost two sections. The siting of a solid waste facility in this area has been under consideration by the County. A significant area bordering on the potential siting area is a BLM Wilderness Study Area (WSA). Although WSA designations are not considered in DHS' suggested siting criteria, such a designation could make it difficult or even impossible to site a specified hazardous waste facility. This siting area does lie just outside of the Volcanic Hazard Zone 1, described previously.

There appear to be no seismic or shallow-groundwater problems affecting the general siting area. Part of this area is subject to floods with a return period of 100 years or less, but sufficient, county-controlled area remains to the west and east of this flood-prone area. Other physical criteria appear to be met at the site. It must be noted that any attempt to site in this area could face stiff opposition, because of the proximity of

Mono Lake and concerns about the Mono Lake Basin. Any attempt to site a facility such as a residuals repository in this area would have to take into account the long transportation distance required to reach this relatively remote county from other parts of the state and the hazards of transporting hazardous waste through Mono County in winter.

The secondary siting area on SR 120 is really several areas of non-federal land off of SR 120 roughly half to two-thirds of the way from US Route 395 to Benton. This siting area could be called the Adobe Valley/Cowtrack Mountain Siting Area.

Transportation into and out of this area would be significantly more difficult than the area off of SR 167. This area could also be affected by the BLM's designation of a WSA in the area, and there could be significant impacts on several wildlife species that would require extensive mitigation if a developer were to choose to site a facility in this area. The terrain is more difficult than the primary area as well. While there are faults in the area, there appear to be no immediate seismic hazards.

Mono County has made a good-faith effort to provide general siting areas in response to the directives of California's Department of Health Services. It must be noted, however, that it would not be economically feasible to site even small facilities as described in DHS' Guidelines (1987a) to meet the County's hazardous waste treatment and disposal needs, since the County's production of hazardous waste would be incapable of supporting them. Further, the siting of treatment facilities in Mono County would seem to run counter to DHS' requirement that such facilities should be sited near to the sources of generation of hazardous waste. While DHS' siting criteria encourage the siting of residuals repositories at greater distances from population centers, the geographic isolation and physical, social and economic conditions of Mono County would seem to make the siting of such a facility in the County highly undesirable, if not impossible.

Mono County will have to consider siting one or two hazardous waste collection centers, perhaps in the Mammoth Lakes and North County areas. The actions the County will take in managing SQG and household hazardous waste are described below, and will depend on the availability of financing for this program.

III. POLICIES

HAZARDOUS WASTE MANAGEMENT/REDUCTION

The California Health & Safety Code (H & S), § 25179.4 establishes hazardous waste management priorities that the Department of Health Services (DHS) and the State Water Resources Control Board (SWRCB) are directed to promote. This hierarchy of priorities is:

- 1) reduction of generated hazardous waste;
- 2) recycling of hazardous waste;
- 3) treatment of hazardous waste; and
- 4) land disposal of residuals from waste treatment and recycling.

AB 2948 requires a County's HWME to take account of the County's potential for source reduction and recycling of hazardous waste. Mono County's HWME is based on planning for the safe treatment, storage, and disposal of hazardous waste that adheres to the hazardous waste management hierarchy established by DHS.

GOAL

To find and implement safe and effective solutions to the management and disposal of hazardous wastes and to achieve a significant reduction in the amount and/or hazard of such wastes produced in Mono County.

OBJECTIVE A

To manage safely and minimize the amount of hazardous waste generated in Mono County.

Policy 1: A hazardous waste minimization program element will be part of any Mono County program to collect and dispose of hazardous waste.

Action 1.1: The major sources, by weight, of hazardous waste in Mono County are lead-acid batteries, cleaning solutions (organic solvents and inorganic liquids), and waste oil. Mono County will emphasize the reduction or recycling of these materials in implementing its hazardous waste minimization program.

Action 1.2: Complete the waste minimization element in order to be eligible for funding of hazardous waste collection programs.

Action 1.3: The waste minimization element will target the following classes of generators first in implementing its waste minimization program:

- (1) Vehicle maintenance (garages and service stations);
- (2) Construction;
- (3) Dry Cleaning services and laundries; and
- (4) Households.

Policy 2: Mono County will work with the Town of Mammoth Lakes to develop and implement a hazardous waste management and minimization program.

Action 2.1: Identify information resources and funding options to support an information, education, and technical assistance program on hazardous waste management for small-quantity generators and households.

Action 2.2: Depending on the availability of funding, Mono County's waste minimization information and education program will undertake actions in the following order of priority:

- (1) Workshops or demonstrations specifically tailored for those small businesses who generate the most hazardous waste in the County;
- (2) Brochures distributed to these generators and to County households;
- (3) Additional information, such as a waste minimization newsletter or appropriate brochures, for other classes of generators and County households.

Action 2.3: Depending on the availability of funding, provide technical assistance first to priority SQGs and then to others in the following order of priority:

- 1) Waste reduction audits as part of inspections. (Inspectors will note wastes for which non-hazardous products could be substituted, processes or operations using hazardous materials which could be changed, or hazardous wastes which could be collected and sent to recycling facilities);
- 2) Cooperation with trade associations to implement the findings of DHS's small business waste audit studies; and
- 3) Cooperation in development of statewide mobile waste minimization technical assistance teams.

Policy 3: Mono County will maintain a data collection system on hazardous wastes generated and waste reduction activities in the County, in order to support future hazardous waste management planning efforts.

Action 3.1: The Departments of Health and Public Works and the Office of Emergency Services will develop and implement a coordinated data collection system that meets California OES requirements for the Emergency Response Plan database and DHS requirements for hazardous waste management planning.

Policy 4: Hazardous waste generated in Mono County will be properly collected, recycled, and disposed.

Action 4.1: Assist specific businesses and households to identify their hazardous waste management and minimization needs.

Action 4.2: Maintain a list that informs Mono County businesses and agencies about the services of environmental consultants, recyclers, on-site treatment companies, and waste haulers.

Action 4.3: Coordinate efforts by small-quantity generators (SQG) and households to secure needed waste-hauling and recycling services in the County.

Action 4.4: Organize and conduct an annual small-business and household hazardous waste (HHW) collection day in the County.

Action 4.5: Establish one or more permanent collection centers in the North County and Mammoth Vicinity for SQG and HHW.

Action 4.6: Promote labeling legislation which will require manufacturers of HH substances to indicate on product labels proper methods of disposal.

Action 4.7: Designate a Mono County HHW month. During this time, efforts to inform the public about HH substances and HHW management programs would be highlighted.

Action 4.8: Promote legislation establishing a hazardous materials tax for hazardous materials producers.

Action 4.9: Use permit applications for mining operations shall address the management of hazardous materials and the treatment, storage and disposal of hazardous wastes produced by such operations. Evidence of adequate mitigation of all potentially significant impacts from hazardous substances used or produced in such operations will be required.

Policy 5: Mono County will evaluate and select options for funding hazardous waste management and minimization programs.

Action 5.1: Evaluate funding from the following sources:

- raising solid waste fees;
- obtaining DHS grants as seed money to institute technical assistance programs for small-business waste audits and waste minimization programs;
- charging fees for audit services;
- charging fees for handling hazardous wastes dropped at collection stations;
- imposing fines for improper hazardous waste disposal; and
- supporting on-going state funding for hazardous waste management in small rural counties.

Policy 6: Mono County will ensure that the public is informed about the hazards associated with improper disposal of hazardous waste.

Action 6.1: Provide hazard information as part of education and information program on hazardous waste handling and disposal for small businesses and households.

REGIONAL COOPERATION

Because of the proximity of Alpine, Mono, Inyo, and portions of Kern Counties to one another and similarities in their relative isolation from the rest of California, climate, natural setting, small populations, relatively small amounts of hazardous waste generated, and limited funding, Mono County favors regional solutions to hazardous waste reduction and management. Regional efforts will focus particularly on small-quantity generators and household hazardous waste.

GOAL

To support and promote regional approaches to waste management as encouraged in AB 2948.

OBJECTIVE A

To foster and implement regional cooperation in the management of SQG and HHW.

Policy 1: Mono County will explore opportunities and methods to work cooperatively with Inyo, Kern, and Alpine counties to manage hazardous waste in the Eastern Sierra.

Action 1.1: Mono County Public Works, Health and Planning staff members will meet with counterparts from Inyo, Kern, and Alpine counties to identify program elements amenable to a regional approach. Staff will prepare a priority list of actions and programs to be undertaken on a regional basis. Meetings with staff from other counties will begin no later than three months after the adoption of the HWME by the Board of Supervisors.

Action 1.2: Within six months after commencing meetings with the staff from other counties, staff will present the supervisors of each county with a draft MOU and description of implementation measures for a regional approach.

Policy 2: Mono County will cooperate with neighboring counties to share data and exchange information on hazardous waste reduction and management.

Action 2.1: Develop a database management system for hazardous waste management and emergency response in cooperation with Alpine and Inyo Counties.

HAZARDOUS WASTE FACILITY SITING

Although separated from heavily populated parts of California by the Sierra Nevada and Mojave Desert, Mono County is part of California's statewide effort to plan for the management of hazardous wastes within the State. Mono County's plan will be part of a collection of plans that address the issues of hazardous waste reduction and management, including potential facility siting, within the state.

The major objective of AB 2948 is to insure that safe, effective, and economical facilities for the management of hazardous wastes are available when they are needed, and that

these facilities are of a type, and operated in a manner, which protects the public health and environment (DHS, 1987a).

Local Assessment Committee

The Tanner Bill mandates Procedures for the Approval of New Facilities (H & S Code, Article 8.7). Among other purposes for these procedures is the Legislature's declared intent "to establish specific means to give the concerned public a voice in decisions relating to the siting and issuance of permits for hazardous waste facilities (Sec. 25199(c))." The mechanism for ensuring a public voice in siting and permitting decisions is the Local Assessment Committee, a seven-member body, appointed by local government, and comprised of representatives of interested businesses, environmental/public interest groups, and the community at large. This group represents the local community in negotiating the specific terms and conditions of project approval with the facility developer (Sec. 25199.7(d).(2).(A)).

Facility Needs Assessment

Treatment, Storage and Disposal (TSD) Facilities, except for residuals repositories and, perhaps, large-scale incinerators, should be located close to generation sources (DHS, 1987a). Since there are no facilities for managing hazardous waste in Mono County, the area could have a capacity shortfall in the range of 650 tons per year by the year 2000. The most likely type of facility needed to accommodate locally generated hazardous waste is a small collection station. The number of such collection stations needed will depend on the specific program adopted by Mono County to collect and dispose of hazardous waste.

Facility Siting

About 88% of the total area of Mono County falls within the jurisdiction of the Federal Government, principally the U.S. Forest Service (USFS) and the Bureau of Land Management (BLM). These lands are not subject to land use control by Mono County or the Town of Mammoth Lakes, although recent court decisions imply that the county and town may impose environmental mitigation conditions on projects on federal lands. Policies of the USFS and BLM exclude the siting of specified hazardous waste facilities on land owned by these agencies, though they would consider sale or land exchange of various parcels to site small facilities, such as collection stations, if such proposals were consistent with USFS, BLM, and County plans and policies.

The siting of major facilities in Mono County could prove very difficult because of natural conditions, extensive use of the area's water resources for recreation and domestic use, and limited transportation access. Except to the south through Inyo County, Mono County is cut off from direct, land access to the rest of California for much of the year because of road closures due to winter conditions in the mountains.

Volcanism, seismic activity, permeable soils, surface water, shallow groundwater, air quality, landslide hazards, and critical wildlife habitats are some of the more difficult exclusionary criteria to satisfy in attempting to site a facility. Natural constraints appear to preclude siting a residuals repository in Mono County.

There are two areas nominated as potential General Siting areas:

- The area in the vicinity--but mostly south--of the intersection of S.R. 167 and Dobie Meadows Road, approximately five miles from the Nevada border; and

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- The area in the vicinity--but mostly north and east--of the intersection of S.R. 120 and River Springs in the Adobe Valley.

These areas present the fewest, yet still substantial, constraints requiring mitigation.

Mono County's hazardous waste facility siting criteria are based on the criteria suggested in DHS' Guidelines (DHS, 1987a) and those published by the Southern California Hazardous Waste Management Authority's (SCHWMA) "Hazardous Waste Facilities Siting Manual" (SCHWMA, 1985). Additional criteria related to conditions unique to Mono County, such as volcanism, have been added as needed.

GOAL I

To provide for the safe, economical, and environmentally sound siting of facilities needed to manage Mono County's hazardous waste while supporting and implementing the hazardous waste management hierarchy.

OBJECTIVE A

To site collection stations to provide for the safe temporary storage of hazardous waste generated in Mono County.

Policy 1: Specify and develop sites for the safe collection of hazardous wastes produced in the County.

Action 1.1: Evaluate potential sites for TSD facilities in the following areas:

- industrially zoned land in the Mammoth Lakes vicinity and North County area;
- sites adjacent to or on County landfill sites;
- sites adjacent to and compatible with road maintenance sites; and
- sites on USFS or BLM that are suitably located and eligible for land exchange.

Policy 2: Collection stations will be subject to the same siting criteria as larger, commercial facilities, except where criteria are identified as applying specifically to residuals repositories and/or specified hazardous waste facilities.

Policy 3: Collection stations should be sited to facilitate ease of public use.

Action 3.1: Identify a preferred site for a small collection/transfer facility in the Mammoth Lakes vicinity. If necessary, identify a suitable site on federal land and negotiate a land exchange with the appropriate federal agency.

GOAL II

To identify general siting areas and provide siting criteria for the safe, economical, and environmentally sound siting of commercial hazardous waste facilities in Mono County.

OBJECTIVE A

To protect the public health and safety of Mono County residents.

Policy 1: Public concerns about the safety of a facility shall be addressed during the planning of the facility.

Policy 2: Treatment and storage facilities should locate at a distance no less than 2,000 feet from the nearest residence, residential zone, or residential designation in the General Plan unless a site-specific risk assessment indicates that public health and safety will not be compromised by a border fence of less than 2,000 feet.

Policy 3: For a residuals repository, the distance from the active portion of the facility to any residence must be a minimum of 2,000 feet.

Policy 4: For facilities handling ignitable, volatile, reactive or acutely hazardous wastes, the minimum distance of 2,000 feet from the nearest residence shall be required unless the facility developer can show that the public is adequately protected in the event of an accident through preparation of a risk assessment and risk management plan.

Action 4.1: Risk assessments shall include a study, funded by the developer, detailing the maximum credible accident from facility operation. The study shall take into account the quantity and types of wastes that could be received at the facility as well as the design features and planned operational practices at the facility. On the basis of these analyses, the study shall provide an estimate of the distance over which any effects would carry, options for reducing the risk, and procedures for dealing with the effects, including recommendations for an appropriate buffer zone.

Policy 5: A risk assessment and risk management plan shall be required of developers of facilities handling ignitable, volatile, reactive, or acutely hazardous wastes that are to be located within one mile of one or more centers of immobile populations .

Policy 6: Facilities not handling ignitable, volatile, reactive, or acutely hazardous wastes shall comply with standard zoning setbacks, unless a greater distance is required by the host community.

Policy 7: All specified hazardous waste management facilities should locate in areas with adequate emergency response capabilities as recommended by the National Fire Prevention Association.

Action 7.1: If necessary, require additional emergency response services at the facility based on the types of wastes handled or the location of the facility.

Action 7.2: If necessary, require additional facility design features or on-site emergency services at facilities locating in remote areas or at facilities handling corrosive, ignitable, reactive, or volatile wastes.

Action 7.3: In areas outside existing fire protection districts, require annexation of the site to the nearest fire district or a contract ensuring provision of on-site emergency services with that district.

OBJECTIVE B

To ensure the structural stability of every TSD facility.

Policy 1: Facilities shall not be located in floodplains or areas subject to flash floods or debris flows, unless the facilities are designed, constructed, operated, and maintained to prevent inundation.

Policy 2: No facilities shall be located in areas subject to seiches and storm surges unless they are designed, constructed, operated, and maintained to prevent failure due to such events.

Policy 3: No facilities should be located in areas which would be inundated by construction of a new dam or raising the level of an existing dam.

Policy 4: All facilities are required to have a 200-foot setback from a known active or potentially active fault.

Policy 5: Treatment and storage facilities locating in areas of potential geologic change, including areas vulnerable to landslide, soil creep, earth flow, or any other mass movement of earth material which might cause a breach, carry wastes away from the facility, or inundate the facility, shall have containment structures designed, constructed and maintained to withstand such changes without failure.

Policy 6: No treatment and storage facilities shall be located in areas subject to subsidence or liquefaction, unless containment structures are designed, constructed and maintained to withstand such changes without failure.

Policy 7: No specified hazardous waste facility shall locate within areas subject to significant lava flow or ash deposition from volcanic eruptions, unless designed, constructed, operated and maintained to prevent failure due to such events.

Policy 8: Residuals repositories are prohibited from locating in areas subject to inundation by floods with a 100-year return frequency, even with protection, and shall not be located in areas subject to flash floods or debris flows, in areas subject to seiches and storm surges, in areas of potential rapid geologic change, in areas subject to subsidence or liquefaction, or in Volcanic Hazard Zone I.

OBJECTIVE C

To protect water quality.

Policy 1: All facilities shall be located in areas where they pose minimal threats to the contamination of drinking water supplies.

Policy 2: All specified hazardous waste facilities should be located in areas downgradient from drinking water supplies.

Action 2.1: All specified hazardous waste management facilities locating in areas upgradient from drinking water supplies shall include a risk assessment of potential project effects on drinking waters. The risk assessment must show that the mitigated impacts of the project are reduced to a non-significant level.

Policy 3: All specified hazardous waste facilities shall locate at least 2000 feet from surface drinking water supplies or provide for additional monitoring of groundwater and the vadose zone.

Policy 4: Specified hazardous waste facilities generating wastewaters shall be located in areas with adequate sewer capacity to accommodate the expected wastewater discharge. If sewers are not available, sites shall be evaluated for ease of connecting to a sewer, or for the feasibility of discharging in some other way that will not affect surface water or groundwater.

Policy 5: All treatment and storage facilities shall locate outside the cone of depression created by pumping a well or well field for 90 days, unless an effective hydrogeologic barrier to vertical flow exists. Location is preferred where the saturated zone predominantly discharges to nonpotable water without any intermediate withdrawals for public water supply.

A residuals repository shall locate away from the cone of depression created by pumping a well or well field for 90 days.

Action 5.1: Require studies to demonstrate that groundwater will be protected, unless the proposed facility is more than 500 feet from a well or well field and the groundwater level is at 150 feet or deeper.

Policy 6: In areas of significant groundwater sensitivity, risk assessments will be used to determine the minimum depth-to-groundwater from the bottom of the specified hazardous waste facility's secondary containment on a case-by-case basis.

Action 6.1: Require engineering studies to demonstrate protection of groundwater in areas where the highest anticipated elevation of underlying groundwater is less than 150 feet from the bottom of the secondary containment.

Policy 7: At all facilities, the foundation of every containment structure must be capable of withstanding hydraulic pressure gradients.

Action 7.1: Require certification by a civil engineer or engineering geologist registered in California that each foundation is capable of withstanding hydraulic pressure gradients which could cause failure due to settlement, compression, or uplift.

Policy 8: Residuals repositories shall satisfy the permit requirements of the Lahontan Regional Water Quality Control Board (RWQCB) for groundwater monitoring.

Action 8.1: Require compliance with all applicable permit requirements of the Lahontan RWQCB for groundwater protection.

Policy 9: Treatment and storage facilities handling liquids shall be sited where groundwater flow is in one direction with no vertical inter-formational transfer of water, unless mitigations measures are used.

Action 9.1: Require above-ground storage and increased spill containment and monitoring measures where multi-directional flow of groundwater occurs.

Policy 10: Treatment and storage facilities in areas supplying principal recharge to a regional aquifer shall be designed, constructed, maintained, and operated so as to preclude any release reaching groundwater.

Action 10.1: Risk assessment will be used to determine a safe setback distance for specified hazardous waste facilities from groundwater recharge areas.

Action 10.2: Require engineered plans that would prevent any release from reaching groundwater for all treatment and storage facilities located in recharge areas.

Policy 11: Residuals repositories are prohibited within any area known to be, or suspected of, supplying principal recharge to a regional aquifer as defined in adopted general, regional or state plans.

Policy 12: Treatment and storage facilities locating in areas where surficial materials are principally highly permeable materials shall provide for increased spill containment and inspection measures.

Policy 13: "Residuals repositories shall locate outside areas where surficial sediments are principally lightly permeable materials such as sand and gravel. All other specified hazardous waste management facilities with subsurface storage/treatment should locate outside areas where surficial sediments are principally lightly permeable materials such as sand and gravel."

Action 13.1: Require compliance with Lahontan Regional Water Quality Control Board requirements for soil permeability at waste management units (i.e., landfills, surface impoundments, and waste piles) to be immediately underlain by natural geologic materials.

OBJECTIVE D

To protect air quality.

Policy 1: Facilities shall comply with Great Basin Unified Air Pollution Control District (GBUAPCD) regulations for approval of all facilities with air emissions which are to be located in non-attainment areas or which will emit air contaminants in excess of established limits.

Policy 2: Facilities shall comply with GBUAPCD regulations for all projects which will emit air contaminants in excess of established limits in attainment areas or those near Class I areas.

Action 2.1: Require compliance with GBUAPCD regulations for specified hazardous waste facilities which are classified under regulations of the GBUAPCD as major stationary sources. Require preconstruction review and application of Best Available Control Technology (BACT).

Policy 3: Encourage siting farther than six miles from Class I areas.

Action 3.1: Require compliance with appropriate USFS and BLM regulations specified hazardous waste facilities locating within ten kilometers (about six miles) of Class I areas.

Policy 4: Specified hazardous waste facilities which may emit toxic air contaminants shall comply with the regulations of the GBUAPCD for preconstruction review and obtain an Authority to Construct and a Permit to Operate from the air district.

Action 4.1: Where a proposed facility will emit an identified toxic air contaminant for which appropriate control measures have not yet been identified, require that all appropriate control measures for the toxic air contaminant be incorporated into facility design.

Action 4.2: Require that a risk assessment be prepared for all proposed incinerators, in accordance with California law (H & S Code, Section 42315).

OBJECTIVE E

To protect environmentally sensitive areas.

Policy 1: All specified hazardous waste facilities shall be prohibited from locating near wetland areas as identified in the Mono County General Plan or by the Army Corps of Engineers.

Policy 2: No specified hazardous waste facility may locate in habitat of special status species or in critical habitat of wildlife of regional importance, unless the proponent can demonstrate that the habitat will not be disturbed and the survival of the species will be ensured in compliance with state and federal requirements.

Action 2.1: Approval may require the proponent to enact mitigation measures, such as the maintenance and enhancement of similar habitats at the site or elsewhere in the area.

Policy 3: All specified hazardous waste facilities should avoid locating in areas presently in agricultural use, or designated in the General Plan or zoned for agricultural uses.

Policy 4: An incinerator shall not be located in an area where the emissions from the facility could directly affect food crops or environmentally sensitive areas.

Action 4.1: As part of the risk assessment carried out on a proposed incinerator's emissions, the potential effects of such a development on food crops or environmentally sensitive areas shall be evaluated. The risk assessment must show no significant, unmitigable adverse effects on either food crops or environmentally sensitive areas affected by the facility's emissions.

Policy 5: All hazardous waste facilities, other than collection stations, shall avoid locating in, or near, areas defined as public and/or private lands having local, regional, state, or national significance, value or importance, such as: national, state, regional, County and local parks and recreation areas; historic resources; wild and scenic rivers, scenic highways, ecological preserves, public and private preservation areas and other lands designated by local, state or federal governments as lands of local, regional, state or national significance.

Action 5.1: Site operations and transportation could be restricted to unused portions or compatible portions of certain public lands. A facility may be screened with landscaping or by topography.

Policy 6: Treatment, storage, and disposal facilities shall avoid locating on or near lands classified by the State Geologist as containing mineral deposits of significance, if the use or preservation of the mineral deposit would be restricted or prevented.

Action 6.1: Request Mineral Resource Zone assessment of potential sites by the State Geologist.

Action 6.2: If a proposed site has not been mapped for potential mineral deposits, the proponent shall prepare a site characterization demonstrating that the area does not contain mineral deposits of significance.

OBJECTIVE F

To ensure safe transportation of hazardous waste.

Policy 1: Minimize transportation of all untreated hazardous waste.

Action 1.1: All TSD facilities, except residuals repositories and regional incinerators, should be located in close proximity to waste generation areas with the majority of transportation over major routes.

Action 1.2: Restrict any residuals repository locating in Mono County to long-term storage only; that is, develop a residuals repository which may accept only those wastes which meet the treatment standards established by the California Department of Health Services in compliance with the requirements of California Health & Safety Code Section 25179 et seq.

Policy 2: Distance traveled on minor roads shall be kept to a minimum.

Action 2.1: Restrict specified hazardous waste facilities to locations adjacent to major routes or accessed from major routes via routes used locally for truck traffic (e.g., truck routes).

Action 2.2: If necessary, require the TSD developer to improve affected local roads by upgrading their load capacity, improving traffic controls and signs, or building truck-only lanes or routes, and assisting in maintenance and snow removal.

Policy 3: Specified hazardous waste facilities should be located where minor routes to the facility are used primarily by trucks and the number of nonindustrial structures (homes, hospitals, schools, etc.) is minimal.

Action 3.1: Require evaluation of the "population at risk" based on the Federal Highway Administration's Guidelines for Applying Criteria to Designate Routes for Transporting Hazardous Materials. The population-at-risk factor should not exceed that for existing facilities; sites with lower factors are preferred.

Action 3.2: If necessary, request that specific highway segments used for hazardous waste transport be scheduled for Caltrans improvement.

Action 3.3: As a condition for obtaining a use permit, Mono County, to protect public safety, may require that transport of hazardous waste be curtailed during periods of peak use by automobiles, school traffic, etc.

Policy 4: The minimum-time path from major market areas to a facility should follow highways with low to moderate average annual daily traffic and accident

rates, as guided by the research and findings of state, regional, and County transportation planners.

OBJECTIVE G

To protect the social and economic development goals of the community.

Policy 1: Minimize adverse economic effects on nearby property.

Action 1.1: Where adverse economic impacts on properties near a specified hazardous waste management facility are an issue, require that the developer negotiate in good faith with the Local Assessment Committee to achieve an equitable settlement, pursuant to the LAC's mandate (H & S Code, §25199.7(d)(2)(A)). The terms and conditions of the negotiated settlement would become part of the conditions for granting a use permit for the facility. Should an independent study be required to determine the economic effects of the project, it should be funded through the Local Agency Technical Assistance Account, as provided under H&S Code, § 25199.7(g).

Policy 2: Residuals repositories shall locate in a specified hazardous waste facility siting area designated in the General Plan which meets the siting criteria established for residuals repositories.

Policy 3: When a hazardous waste treatment or disposal facility is approved, the applicable general plan document (County or Town of Mammoth Lakes) shall be amended to identify the approved site as a hazardous waste treatment or disposal facility location, so as to ensure compatible land uses within 2000 feet of the active portion of the facility.

Action 3.1: Designate approved TSD facility sites for specified hazardous-waste-facility or industrial use in the General Plan.

Action 3.2: Restrict development within 2000 feet of the active portion of the facility to non-residential uses in the General Plan.

Policy 4: Permit the siting of TSD facilities at or near federal, state, county, or local facilities that supply services, such as highway maintenance and storage areas, airports, city or county corporation yards, waste disposal facilities, or sewage treatment facilities.

Policy 5: A proposed facility, when compared with current and other reasonably possible uses for the subject site, should not show a net loss of tax and other revenues to Mono County or the Town of Mammoth Lakes.

Action 5.1: If appropriate, require an economic assessment of the proposed facility's impact on tax and revenue generation, infrastructure needs, and cost to the County and Town. The county or town and the facility proponent will negotiate appropriate mitigation for negative economic effects, if any, on Mono

County or the Town of Mammoth Lakes. The terms and conditions of the negotiated settlement would become part of the conditions for granting a use permit for the facility.

Policy 6: All specified hazardous waste management facility developments will conform to county requirements for major developments, which are found in the Mono County General Plan.

Policy 7: A use permit shall be required for all specified hazardous waste facilities.

Action 7.1: Require appropriate CEQA documentation and in-depth site assessment for all environmental, economic, and safety criteria applicable to the facility.

Action 7.2: Require a finding of consistency with the Hazardous Waste Management Element of the Mono County General Plan.

Action 7.3: Require a finding of regional need for the facility.

Action 7.4: Review access routes and, if necessary, designate specific routes for access or exclusion.

Action 7.5: As a condition for receiving a Use Permit, each specified hazardous waste management facility shall be subject to the following Mono County Department of Environmental Health (DEH) requirements:

- DEH review and approval of the facility's Operations Plan;
- DEH review and approval of the waste stream treated and/or disposed (type and quantity);
- DEH right of access for inspection of the facility;
- DEH right to require shut-down of operations if the facility is not in compliance with the operations / risk management plan submitted to DEH; and
- periodic reports on the facility's operations to DEH.

Action 7.6: Impose the allowable hazardous waste facility fee, portions of which shall be used for funding DEH review and regulatory activities and for maintaining offsite emergency response capabilities.

Action 7.7: Assess the applicant a fee for technical and negotiating assistance, as required in H & S Code Section 25199.7 (g). Local communities / assessment committees are strongly encouraged to employ a professional negotiator in addition to any technical consultants to assist during the negotiation process required in H & S Code Section 25199.7 (d)(2)(A).

Policy 8: The public shall be notified of public hearings regarding proposed use permits for all hazardous waste facilities.

Action 8.1: Require written notification of all public hearings on the proposed project be sent to all property owners and residents within 3,000 feet surrounding the facility's exterior boundary.

Action 8.2: Require placement of prominent advertisements in local newspapers of general circulation and posting of a 24-square-foot sign on the property. All notices must identify the nature of the proposed facility, a telephone number to contact for further information and the dates, times, and locations of all public hearings on the project.

Action 8.3: Comply with appropriate noticing requirements of the Mono County and Town of Mammoth Lakes Codes.

**HAZARDOUS WASTE MANAGEMENT ELEMENT
IMPLEMENTATION (AS SPECIFIED BY DHS GUIDELINES)**

The schedule for adoption of the Final Hazardous Waste Management Element by Mono County is as follows:

Draft HWME submitted to DHS for review
March 31, 1988.

Comments received from DHS
July 1, 1988.

Extension on Final Element submission granted
September 1, 1988.

Negative Declaration circulated for review
October, 1988.

Public Hearings on the HWME Neg Dec
County and Town Planning Commissions
November, 1988;

Town Council
December, 1988;

Board of Supervisors
January, 1989.

Submission of Final HWME to DHS
February, 1989.

Public Education and Participation

Public involvement during preparation of the Draft HWME has focused on the Tanner Advisory Committee. The committee has held monthly meetings to review progress in the Plan. The following are the members of the Mono County Tanner Advisory Committee:

County Appointments and Affiliation

Jerry Burt
Planning Commission
11 Lone Company Road
Coleville, CA. 96107

Dan Totheroh
Inyo National Forest
873 N. Main St.
Bishop, CA. 93514
(Bob Kimball, Alternate)

MONO COUNTY GENERAL PLAN

Bill Bryant
Toiyabe National Forest
P.O. Box 595
Bridgeport, CA. 93517

Bob Beehler
Bureau of Land Management
873 N. Main St., Ste. 201
Bishop, CA. 93514

Don Redmon
Mammoth Mountain
P.O. Box 24
Mammoth Lakes, CA. 93546

Jim Parker
Mono Lake Committee
P.O. Box 29
Lee Vining, CA. 93514

Richard Moss
Hammil Valley Rancher
Rt. 4 Box 17
Bishop, CA. 93514

Town Appointments and Affiliation

Tom Jacobsen
P. O. Box 660
Planning Commission
Mammoth Lakes, CA 93546

Jon Sweeny
Mammoth Lakes Fire District
P. O. Box 5
Mammoth Lakes, CA. 93546

Arnie Samardich
Waste Hauler
P. O. Box 237
Mammoth Lakes, CA 93546

COUNTY STAFF SUPPORT FOR COMMITTEE

Planning Department (Lead): Scott Burns
Public Works: Jim Ward
Health Department: Robin Hook
Energy Management: Dan Lyster
Emergency Services: Boe Turner

Presentations were also provided to the Mono County Board of Supervisors and Planning Commission, and to the Mammoth Lakes Planning Commission. Public hearings will be held before the County Planning Commission, County Board of Supervisors, Mammoth Lakes Planning Commission and Mammoth Lakes Town Council before final adoption of the HWME.

Mr. Scott Burns, Mono County Planning Department, is the principal contact person for the Mono County HWME.

Ongoing Data Collection

Mono County does not have a coordinated hazardous waste/materials data collection and analysis program at the present time. The County Department of Health collects data on underground storage tanks and the Office of Emergency Services collects data on hazardous materials under the Hazardous Material Response Plan Program (AB 2185/2187).

County facilities will be organized to store and retrieve planning, hazardous waste, solid waste, UST, and hazardous materials inventory data. The collection center for these data will be the Mono County Office in Bridgeport. Mono County will cooperate with the Great Basin Unified Air Pollution Control District, the Lahontan Regional Water Quality Control Board, and neighboring jurisdictions to coordinate data collection and analysis.

Waste Reduction Implementation Program

Section III.A describes Mono County's and the Town of Mammoth Lakes' approach to implementing a waste reduction program for small quantity generators and households.

Siting

See Section III.C. Procedures for siting hazardous waste facilities in Mono County will comply with Mono County's (on the Town's) General Plan, CEQA Guidelines, and the Guidelines for Siting Specified Hazardous Waste Facilities Under AB 2948, issued by the California Office of Planning and Research, Office of Permit Assistance.

Transportation

Transportation of hazardous materials in and through Mono County has been described in the Issues section.

Storage

Mono County UST Program

The Mono County Department of Health, Environmental Health Division, is implementing the Underground Storage Tank (UST) Program. The program has

identified 325 USTs in Mono County. Tanks can be retained if their installation meets one of eight approved monitoring requirements. The deadline for tank approval is June 30, 1988.

Mono County AB 2185/2187 Program

Above-ground storage is regulated through Mono County's AB 2185/2187 Program. Currently there are 41 businesses registered with the program. Details on program implementation are available in the County's AB 2185/2187 Area Plan (Mono County Sheriff's Dept., 1987).

Contaminated Sites

There are no listed contaminated sites in Mono County, and, therefore, no existing or planned program to deal with contaminated sites.

Small Quantity Generators

See Section III.A.

Household Wastes

See Section III.A.

Emergency Response

See the Issues section for program descriptions.

Regulations, Enforcement, and Surveillance

Because Mono County's hazardous waste generators are small businesses or households, enforcement and surveillance are less important than information and education. Farm use of pesticides is inspected. Underground storage tank sites have been tested and businesses that have submitted business plans for the AB 2185/2187 Program are inspected as required.

Fire inspections take place regularly in the 11 fire districts in the County. Other regulatory bodies that carry out periodic inspections and enforcement in Mono County include the Great Basin Unified Air Pollution Control District and the North Lahontan Regional Water Quality Control Board.

Organization and Responsibility

At this time, there are no plans in Mono County to alter departmental responsibilities for the enforcement of various aspects of hazardous materials and waste management. Policies and Actions proposed in Section III outline general organizational responsibilities for programs, but no detailed determination of future departmental responsibilities has been made at this time.

Funding

See Section III.A, Policy 5.

Monitoring and Evaluation

Monitoring and evaluation will be done to improve programs and to provide information for HWM Element updates. Existing programs (UST; AB 2185/2187) include monitoring and evaluation procedures. As SQG and HH programs are implemented, monitoring and evaluation procedures and responsibilities will be defined more specifically.

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